

WIGGINS CHILDS
PANTAZIS FISHER
GOLDFARB
Advocates & Litigators

December 17, 2019

ROBERT L. WIGGINS, JR.
DENNIS G. PANTAZIS
ANN K. WIGGINS
SAMUEL FISHER
DEBORAH A. MATTISON
JON C. GOLDFARB
GREGORY O. WIGGINS
ROCCO CALAMUSA, JR.
BRIAN CLARK
RUSSELL W. ADAMS
CRAIG L. LOWELL
CANDIS A. MCGOWAN
TEMPLE D. TRUEBLOOD
H. WALLACE BLIZZARD
KEVIN W. JENT
JENNIFER WIGGINS SMITH
ROBERT J. CAMP
RACHEL LEE MCGINLEY
JOSHUA R. GALE
L. WILLIAM SMITH
D.G. PANTAZIS JR.
SIDNEY JACKSON
PATRICK L. PANTAZIS
LACEY DANLEY
EVAN D. PANTAZIS
CHRISTINA MALMAT
LIESELOTTE CARMEN-BURKS
KAMERON M. BUCKNER

ERIC C. SHEPPER
STAFF ATTORNEY

SANDRA DUCA
TIMOTHY B. FLEMING*
TERRILL W. SANDERS
OF COUNSEL
*Not Licensed in Alabama

ROBERT F. CHILDS, JR.
(1947-2018)

VIA ECF AND EMAIL

The Honorable Sarah Netburn
United States Magistrate Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Email: Netburn_NYSDChambers@nysd.uscourts.gov

Re: *Patricia Ryan, in her own right and as Executrix of the Estate of John J. Ryan, deceased; Kristen Ryan; Laura Ryan; Colin Ryan; Katherine Maher, in her own right and as Executrix of the Estate of Daniel L. Maher, deceased; Daniel R. Maher; Joseph F. Maher; Kristen Breitweiser, in her own right and as Administratrix of the Estate of Ronald Breitweiser, deceased; Caroline Breitweiser; Patricia D. Casazza, in her own right and as Administratrix of the Estate of John Francis Casazza, deceased; John F. Casazza; Mindy Kleinberg, in her own right and as Administratrix of the Estate of Alan D. Kleinberg, deceased; Lauren Nicole Kleinberg; Jacob Kleinberg; Sam Eric Kleinberg; Lorie Van Auken, in her own right and as Executrix of the Estate of Kenneth Van Auken, deceased; Sarah Van Auken; and Matthew Van Auken ("Ryan Plaintiffs") v. The Islamic Republic of Iran, et. al.*

Dear Judge Netburn:

Pursuant to your Order, dated November 26, 2019 (Doc. 5312), we are submitting this status letter indicating how the above-referenced Plaintiffs (the "Ryan Plaintiffs") will be removed from their current complaints.

The *Ryan Plaintiffs* have retained attorneys who are currently and previously representing the *Havlish*, *Hoglan*, and *Ray Plaintiffs*.

Your Honor has granted the prior attorneys for the *Ryan Plaintiffs* to withdraw and has also granted the Motions to Substitute Counsel (*see* Text Orders at Docs. 5098, 5099, 5156, 5157, and 5312).

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All of the *Ryan* Plaintiffs are similarly situated in that they were represented by different attorneys and their claims were filed in different complaints. In order to be consistent and in compliance with the Court's Order, we will be filing a motion to remove and transfer the claims from their current complaints and establishing them in a new Complaint to be entitled *Ryan, et al. v. The Islamic Republic of Iran, et al.* While their current complaints name three defendants, the newly established Complaint will also name 13 other Iranian defendants, which is of paramount importance for enforcement and collection of the judgments abroad. Whereas, the *Ryan* Plaintiffs have previously received judgments against three defendants, the newly established Complaint will seek a judgment against all 16 Iranian defendants in favor of the *Ryan* Plaintiffs, as was the case in *Havlish* and *Hoglan*.

Counsel for the *Ryan* Plaintiffs are currently vetting the Complaint and we respectfully request the Court to allow the *Ryan* Plaintiffs until January 6, 2020 to file a motion to remove and transfer from their current complaints into a newly filed *Ryan, et al.* Complaint, consistent with your Order and consistent with the directions of our clients.

Respectfully Submitted,

/s/ Dennis G. Pantazis

Dennis G. Pantazis

cc: All counsel of record via ECF